

LTG  
F# 2021R00157

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

— against —

GINA SANTORO,

Defendant.

INDICTMENT

Cr. No. 1:21-cr-00141(ARR)(RER)

(T. 18, U.S.C., §§ 371, 922(a)(1)(A),  
922(g)(1), 924(a)(1)(D), 924(a)(2),  
924(d)(1), 2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

## THE GRAND JURY CHARGES:

## THE GRAND JURY CHARGES:

COUNT ONE

(Firearms Trafficking Conspiracy)

1. In or about and between March 5, 2020 and May 11, 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GINA SANTORO, together with others, did knowingly and willfully conspire to engage in the business of dealing in firearms without being a licensed importer, licensed manufacturer or licensed dealer, and in the course of such business, to ship, transport and receive one or more firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant GINA SANTORO, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

- (a) On or about March 5, 2020, SANTORO, together with others, traveled from Staten Island, New York to Pennsylvania.
- (b) On or about March 5, 2020, SANTORO obtained a Pennsylvania State Driver's license, which she used to purchase two Ruger .22 caliber pistols from Dealer 1, a firearms dealer in East Earl, Pennsylvania, the identity of which is known to the Grand Jury.
- (c) On or about March 5, 2020, SANTORO, together with others, left Pennsylvania and traveled back to Staten Island.
- (d) On or about March 14, 2020, SANTORO, together with others, traveled from Staten Island, New York to Pennsylvania.
- (e) On or about March 14, 2020, SANTORO purchased one Ruger .22 caliber pistol and one 9mm pistol from Dealer 2, a firearms dealer in Cresco, Pennsylvania, the identity of which is known to the Grand Jury.
- (f) On or about March 14, 2020, SANTORO, together with others, left Pennsylvania and traveled back to Staten Island.
- (g) On or about April 11, 2020, SANTORO, together with others, traveled from Staten Island, New York to Pennsylvania.
- (h) On or about April 11, 2020, SANTORO purchased one 9mm pistol from Dealer 2.

(i) On or about April 11, 2020, SANTORO, together with others, left Pennsylvania and traveled back to Staten Island.

(j) On or about April 18, 2020, SANTORO, together with others, traveled from Staten Island, New York to Pennsylvania.

(k) On or about April 18, 2020, SANTORO purchased three Ruger .22 caliber pistols from Dealer 2, one of which bore serial number 36857247 (the “36857247 Firearm”).

(l) On or about April 18, 2020, SANTORO, together with others, left Pennsylvania and traveled back to Staten Island.

(m) On or about May 11, 2020, Conspirator 1, an individual whose identity is known to the Grand Jury, used the 36857247 Firearm to shoot John Doe 1, John Doe 2 and John Doe 3, individuals whose identities are known to the Grand Jury. John Doe 1 and John Doe 2 died as a result.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO  
(Firearms Trafficking)

3. In or about and between March 5, 2020 and May 11, 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant GINA SANTORO, together with others, not being a licensed importer, licensed manufacturer or licensed dealer of firearms, did knowingly and willfully engage in the business of dealing in firearms, and in the course of such business, did ship, transport and

receive one or more firearms in interstate and foreign commerce, to wit: the 36857247 Firearm.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551  
et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon her conviction of either of the offenses charged herein, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

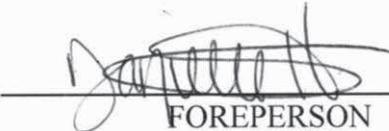
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

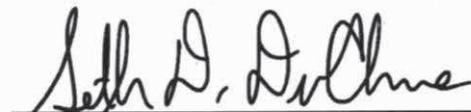
(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



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FOREPERSON



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SETH D. DUCHARME  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

F. # 201901243  
FORM DBD-34  
JUN 85

**UNITED STATES DISTRICT COURT**

EASTERN District of NEW YORK

CRIMINAL DIVISION

**THE UNITED STATES OF AMERICA**

vs.

**GINA SANTORO,**

Defendant.

**INDICTMENT**

(T. 18, U.S.C., §§ 371, 922(a)(1)(A), 922(g)(1), 924(a)(1)(D),  
924(a)(2), 924(d)(1), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

Bail, \$ \_\_\_\_\_

Rachel A. Shanes, Assistant U.S. Attorney (718) 254-6140